

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA  
LINCOLN DIVISION**

CATHERINE PALMER, individually and on behalf of others similarly situated,	)	CASE NO. 4:19-cv-03084-JMG-MDN
	)	
	)	JUDGE JOHN M. GERRARD
Plaintiff,	)	
vs.	)	<b>DEFENDANT KCI USA, INC.'S MOTION</b>
	)	<b>FOR LEAVE TO FILE EXPERT</b>
KCI USA, INC.,	)	<b>REPORT WITH RESTRICTED ACCESS</b>
Defendant.	)	

Pursuant to Federal Rule of Civil Procedure 5.2 and Nebraska Civil Rule 5.3(b), Defendant KCI USA, Inc. ("KCI") hereby seeks leave to file Exhibit B (Jan Kostyun's Rebuttal and Direct Report) to KCI's Motion to Exclude under restricted access on the public docket. (*See* Doc. 63.)

On October, 9, 2020, KCI filed a redacted version of Exhibit B in light of the Protective Order and Health Insurance Portability and Accountability Act. Exhibit B contains personal and medical information of KCI patients. Accordingly, KCI respectfully requests that the Court grant its request for leave to file an unredacted version of Exhibit B with restricted access to counsel of record and Court users.

Respectfully submitted

/s/ Eric Larson Zalud

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**CERTIFICATE OF SERVICE**

This is to certify that on October 15, 2020, the foregoing *DEFENDANT KCI USA, INC. 'S MOTION FOR LEAVE TO FILE EXPERT REPORT WITH RESTRICTED ACCESS* was filed electronically in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all parties by operation of the Court's electronic case filing system.

/s/ Eric Larson Zalud  
Eric Larson Zalud  
*Attorney for Defendant KCI USA, Inc.*